

STATEMENT OF BASIS

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0099911
to discharge to waters of the State of Louisiana.
AI No.: 6576 / Activity No.: PER20080001

THE APPLICANT IS: Emerson Process Management
Instrument & Valve Services
12523 Coon Trap Road
Gonzales, LA 70737

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Bonnie Wascom

DATE PREPARED: August 14, 2008

1. PERMIT STATUS

- A. LPDES permit – LA0099911
LPDES permit effective date: August 1, 2003
LPDES permit expiration date: July 31, 2008
- B. LWDPS permit – NA
LWDPS permit effective date: NA
LWDPS permit expiration date: NA
- C. Date Application Received: February 1, 2008

2. FACILITY INFORMATION

- A. FACILITY TYPE/ACTIVITY – Industrial and fluid power valve reconditioning shop

This is an existing facility that reconditions industrial control valves and instruments from pulp and paper and petro-chemical industries. Valves are reconditioned for resale in the Encore portion of the facility. The exterior of the valves that are received for reconditioning are decontaminated and drained of product prior to shipment to the facility. Residual product may be contained in the packing material within the valve and cannot be removed until valve is disassembled. The removed residual product is packed into drums and then tested for hazardous materials to ensure it is disposed of in accordance with all local, state and federal regulations. Hydrostatic test water is generated from hydrostatic testing on finished valves. At the hydrostatic test station, water is run through the reconditioned valve to ensure that all mechanisms are operating properly. The wastewater generated is pumped from hydrostatic test stations in the Encore portion of the facility and from the repair building to the wastewater treatment system. During disassembly, valves that contain residual acid in the packing area are

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placed in a container of water then baking soda is added to neutralize the acid. A neutral pH is verified before the neutralized water is pumped to the wastewater treatment system through the hydrostatic test station.

The sanitary wastewater generated by this facility is also collected and treated by the on-site wastewater treatment system.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: I
3. Wastewater Type: III
4. SIC code: 7699

C. LOCATION - 12523 Coon Trap Road
Gonzales, Ascension Parish
Latitude +30° 15' 21", Longitude -90° 56' 78"

3. OUTFALL INFORMATION

Outfall 003

Discharge Type: Treated sanitary wastewater commingled with treated hydrostatic test water and acid neutralization water

Treatment: extended aeration and chlorination for sanitary wastewater, hydrostatic and acid neutralization wastewaters are neutralized with baking soda prior to commingling with the sanitary wastewater

Location: at the point of discharge from the wastewater treatment system prior to mixing with other waters

Flow: 4,060 GPD treated sanitary wastewater; 500 GPD hydrostatic and acid neutralization wastewaters

Discharge Route: by pipe to local drainage, thence into Grand Goudin Bayou, thence into New River

NOTE: This facility does not require storm water permit coverage because it does not discharge regulated storm water. The facility's SIC code, 7699, is not listed in the storm water regulations at LAC 33:IX.2341.B.14.a-k and therefore the storm water runoff from the site is not classified as regulated industrial storm water.

4. RECEIVING WATERS

STREAM – Outfall 003 – by pipe to local drainage, thence into Grand Goudin Bayou, thence into New River

BASIN AND SEGMENT – Lake Pontchartrain – Subsegment 040404

DESIGNATED USES:

- a. Primary contact recreation
- b. Secondary contact recreation

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c. Propagation of fish and wildlife

5. EXISTING EFFLUENT LIMITS

A. Outfall 003 – Treated sanitary wastewater commingled with treated hydrostatic test water and acid neutralization water

<u>Pollutant</u>	<u>Limitation</u>	<u>Monitoring</u>
	Mo. Avg.: Weekly Avg.	
Flow (GPD)	Report: Report	Semiannually
TSS (mg/l)	---: 45	Semiannually
BOD ₅ (mg/l)	---: 45	Semiannually
Fecal Coliform (colonies/ 100 ml)	---: 400	Semiannually
Oil & Grease (mg/l)	---: 15	Semiannually
BTEX (µg/l)	---: 250	Semiannually
pH (s.u.)	6.0 - 9.0	Semiannually

6. PROPOSED EFFLUENT LIMITS

BASIS – See rationale below.

7. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

There was an inspection on **March 23, 2004** that noted no areas of concern. There are no open, appealed, or pending OES enforcement actions as of **August 7, 2008**. There is no EPA enforcement history on file as of **August 7, 2008**.

B. DMR Review/Excursions

A DMR review was performed for the period of January 2004-June 2008. For this time period 5 DMRs were reviewed for Outfall 003. 1 excursion for TSS and 1 excursion for Fecal Coliform were reported.

8. ENDANGERED SPECIES

The receiving waterbodies and discharge are not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

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9. 303 (d) LISTED WATERBODIES

Subsegment 040404, New River - Headwaters to New River Canal, is listed on LDEQ's Final 2006 303(d) List as impaired for organic enrichment/low dissolved oxygen (DO) and pathogen indicators (fecal coliform). To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Lake Pontchartrain Basin, those suspected causes for impairment which are not directly attributed to the chemical blending facility point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated.

Based on an evaluation of the discharges, it was determined that the discharge of treated sanitary wastewater commingled with treated hydrostatic test water and acid neutralization water from this facility has the potential to discharge pollutants which may contribute to organic enrichment/low dissolved oxygen and pathogen indicators impairments of the receiving waterbody. The organic enrichment/ low DO impairment shall be addressed through the BOD₅ parameter. The pathogen indicators impairment shall be addressed through the Fecal Coliform parameter.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

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Public notice published in:

Local newspaper of general circulation
Office of Environmental Services Public Notice Mailing List

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Rationale for Water Treatment Plant

1. **Outfall 003** – Treated sanitary wastewater commingled with treated hydrostatic test water and acid neutralization water

<u>Pollutant</u>	<u>Limitation*</u>	<u>Reference**</u>
	Daily Max.: Weekly Avg	
Flow (GPD)	Report: Report	LAC 33:IX.2361.1.1.b
TSS (mg/l)	---: 45	Similar discharges (BPJ)
BOD ₅ (mg/l)	---: 45	Similar discharges (BPJ)
Fecal Coliform (colonies/ 100 ml)	400: ---	Similar discharges (BPJ)
Oil & Grease ¹ (mg/l)	15: ---	Similar discharges (BPJ)
BTEX ¹ (µg/l)	250: ---	Similar discharges (BPJ)
pH (s.u.)	6.0 - 9.0	Similar discharges (BPJ)

Treatment: extended aeration and chlorination for sanitary wastewater, hydrostatic and acid neutralization wastewaters are neutralized with baking soda prior to commingling with the sanitary wastewater

***Monitoring Frequency:** Once per six months for all parameters at the point of discharge from the wastewater treatment system prior to mixing with other waters.

****Limits Justification:** For all parameters, limits and monitoring frequencies are based on previous permit and existing permits for similar discharges.

¹Sampling for these parameters shall be conducted on the days hydrostatic test wastewater and acid neutralization water are discharged into this waste stream.

BPJ Best Professional Judgment
GPD Gallons per Day
s.u. Standard Units

NOTE:

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

Storm Water Pollution Prevention Plan (SWP3) Requirement

Discharges from this facility are not classified as industrial storm water per LAC 33:IX.2341.B.14. Therefore, the Storm Water Pollution Prevention Plan (SWP3) requirement is not included in this permit.

However, per LAC 33:IX.903.B, all above ground storage tanks with a capacity of 660 gallons for an individual container or 1320 for multiple containers, must have secondary containment and a Spill Prevention and Control Plan.